United States of America
Federal Communications Commission
Washington, DC

In the Matter of
Proposal for Creation of Low Power FM
(LPFM) Broadcast Service, as discussed
in the Notice of Proposed Rulemaking, MM Docket 99-25

Written Reply-Comments of Adrian Kohn, General Manager
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Please note that the opinions expressed herein represent the personal views of the author in accordance with his support for legislation that benefits the radio station for which he serves as General Manager. The opinions expressed herein do not necessarily represent the views of Georgetown University.

A. Introduction

1. I wish to respond to comments I, Adrian Kohn, filed with the Federal Communications Commission on June 14, 1999, in the matter regarding the proposal for creation of Low Power FM (LPFM) broadcast service, as discussed in the Notice of Proposed Rulemaking, MM Docket 99-25.

B. Interference Protection Criteria

2. In Paragraph 10 under subheading D, entitled Interference Protection Criteria, of the aforementioned comments filed on June 14, 1999, I state the crucial fact that:

> "According to the 'Minimum Distance Separation (km) Necessary To Cause No Overlap/Receive No Overlap' listed in Appendix B of the FCC's Notice of Proposed Rulemaking (MM Docket 99-25), there are currently no possibilities of an LPFM station in the Washington, DC, area (be it LP1000, LP100, or Microradio)."

To remedy the fact that LPFM as currently proposed in the Notice of Proposed Rulemaking will not significantly benefit major metropolitan centers like Washington, DC, I previously suggested relaxing the 'Receive No Overlap' minimum distance separations for low power stations in Paragraphs 9-10. In effect, LP100 and Microradio stations would receive minimal interference from surrounding stations with the understanding that the audience who could receive their signals would be so benefited by the community-focused broadcast as to outweigh the unfortunate interference. The FCC must investigate this method of maximizing the effectiveness of LPFM broadcasting which would maximize the number of voices on the air and the number of stations devoted exclusively to their community. However, there is another more pivotal change the FCC must adapt to ensure the greatest possible benefits of LPFM broadcast service.

3. To predict interference the FCC must use the "prohibited contour overlap" method, as is now employed in the Low Power Television service, instead of minimum distance separation requirements. Under the prohibited contour overlap method, stations would be identically protected as under minimum distance requirements. However, many more LPFM stations could be created broadcasting with directional signals, covering the communities to which they are so integral and concurrently causing no interference to

surrounding stations' signals. Directional signals will maximize the effectiveness of LPFM throughout the nation. LPFM will undoubtedly help communities in sparsely populated areas of the United States. However, the current LPFM system proposed by the FCC will only minimally benefit densely populated areas. Most metropolitan centers will not benefit from LPFM if minimum distance separation requirements are used to predict interference. Cities throughout the United States are in dire need of radio that focuses on local interests instead of nationwide profits. The FCC must use the prohibited contour overlap method instead of minimum distance requirements for predicting interference in order to remedy the potentially fatal weakness of LPFM's failing to benefit Americans living in urban centers.

Respectfully submitted,

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